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GOOGLE LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**GOOGLE LLC'S PROPOSED JURY VOIR
DIRE QUESTIONS**

Courtroom: 3, 17th Fl.
Judge: Hon. Richard Seeborg

Action Filed: July 14, 2020
Trial: August 18, 2025

On June 20, 2025, the Parties submitted their Joint Proposed Jury Questionnaire Questions. Dkt. 515. Assuming that the Court enters the Parties' proposed jury questionnaire as submitted, Google reserves the right to ask follow-up questions based on prospective jurors' answers to the questionnaire during attorney voir dire. For that reason, those questions are not reproduced below.

A. Google's Proposed Jury Voir Dire Questions

1. Have you ever deliberately avoided using a company's product or service because of its reputation for handling personal data and privacy?
 - a. If so, which company? What influenced your decision?
2. Do you or anyone close to you have a strong opinion, either positive or negative, about large technology companies?
 - a. If so, what is that opinion and why?
3. Do any of you have strong views about the terms of service agreements around data privacy that app users are typically required to read and agree to before downloading and using mobile apps?
4. Have you or anyone close to you been involved in a dispute about data privacy or protection?
5. Do you have a Gmail account? Do you use any Google products or services, such as Google Maps, Google Photos, or Google Docs?
 - a. If so, which products/services do you use?
 - b. What has been your general experience with these products/services – positive, negative, or neutral?

1 Dated: July 25, 2025

Respectfully submitted,

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4 By: /s/ Benedict Y. Hur

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